

**REMARKS**

***Summary of the Amendment***

Upon entry of the above amendment, claims 40 and 51 will have been canceled, claims 29, 45-50, 52, 53, 55, 64, 81 and 82 will have been amended, and claim 99 will have been added. Accordingly, claims 29-39, 41-50 and 52-99 will be pending, with claims 29, 81 and 82 being in independent form.

***Summary of the Official Action***

In the Office action, the Examiner objected to claim 81 as being a substantial duplicate of claim 29. The Examiner also rejected claims 29-40, 42-51 and 54-98 over the applied art of record. However, the Examiner failed to indicate the status of and/or treat on the merits claim 41. Finally, while mentioning claims 52, 53, 59-62, 65-71, 78, 90 and 92 on page 4 of the Office Action, the Examiner neglected to specifically indicate that these claims were in fact rejected. In this regard, Applicant believes that the Examiner also failed to indicate the status of and/or treat on the merits these claims. By the present amendment and remarks, Applicant submits that the rejections have been overcome, and respectfully requests reconsideration of the outstanding Office Action and allowance of the present application.

*Interview of December 9, 2003*

Applicant appreciates the courtesy extended by Examiner Dang Le in the interview of December 9, 2003. In the interview, Applicant's representative discussed, among other things, that none of the applied documents, and specifically WINTHER, disclose or suggest the features shown in Fig. 2, i.e., the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion in combination with the features recited in claim 29. In response, the Examiner agreed.

Applicant's representative also discussed, among other things, that none of the applied documents, and specifically WINTHER, disclose or suggest the features shown in Fig. 6, i.e., an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module in combination with the features recited in claim 81. Again, the Examiner expressed agreement.

Applicant's representative additionally also discussed, among other things, that none of the applied documents, and specifically WINTHER, disclose or suggest the features shown in Fig. 7, i.e., an electronic power circuit connected to each of the first motor and an

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electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other in combination with the features recited in claim 81. Again, the Examiner expressed agreement.

Finally, Applicant's representative pointed out that claims 81 and 28 are duplicate claims because claim 81 recites "the first stator being coupled to the second stator" and this feature is not specifically recited in claim 29. The Examiner agreed to consider this argument and reconsider the objection upon Applicant's filing of a response to the instant Office Action.

***Present Amendment is proper for entry***

Applicant submits that the instant amendment is proper for entry after final rejection. In particular, Applicant notes that no question of new matter nor are any new issues raised in entering the instant amendment of the claims and that no new search would be required, especially since the Examiner has agreed in the Interview that the claims as amended would define over the applied documents and especially WINTHER, and further because the Examiner failed to consider the merits of all pending claims, i.e., claims 41, 52, 53, 59-62, 65-71, 78, 90 and 92 were not fully and/or expressly treated on the merits.

Moreover, Applicant submits that the instant amendment places the application in condition for allowance, or at least in better form for appeal.

Accordingly, Applicant request that the Examiner enter the instant amendment, consider the merits of the same, and indicate the allowability of the present application and each of the pending claims.

***The Finality of the Instant Office Action is Improper***

In the instant Final Office Action, the Examiner acknowledged in the Office Action Summary that all pending claims 29-98 were rejected. However, the Examiner only treated claims 29-40, 42-51 and 54-98 on the merits and failed to specifically and/or expressly indicate the status (i.e., rejected or allowed) of claims 41, 52, 53, 59-62, 65-71, 78, 90 and 92.

In particular, the Examiner failed to even mention claim 41 and, while mentioning claims 52, 53, 59-62, 65-71, 78, 90 and 92 on page 4 of the instant Office Action with reference to the rejection of claims 30, 32, 33 and 37, the Examiner failed to specifically indicate whether these claims were in fact rejected.

Thus, it is submitted that claims 41, 52, 53, 59-62, 65-71, 78, 90 and 92 were not properly treated on the merits. Accordingly, Applicant respectfully submits that the finality of instant Office Action is improper and should be withdrawn, and further requests that the Examiner indicate the status of all pending claims in the next Office Action.

***The Objection to the Claims is improper***

The Examiner objected to claim 81 as being the substantial duplicate of claim 29.

Applicant respectfully disagrees with the Examiner's assertion. As the Examiner will note, and as pointed out in the Interview of December 9, 2003, claim 81 recites that the first and second stators are coupled to each other. On the other hand, claim 29 does not specifically recite this feature.

Accordingly, the objection is believed to be improper and the Examiner is requested to withdraw this objection.

***Traversal of Rejection Under 35 U.S.C. § 102(b)***

Applicant traverses the rejection of claims 29, 31, 34, 40, 42-51, 55-58, 63, 64, 72-77, 79-85, 87-89, 91 and 93-95 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 1,848,091 to WINTHER.

The Examiner asserted that this document discloses all the features recited in these claims including the first and second motors. Applicant respectfully traverses this rejection.

Notwithstanding the Examiner's assertions as to what WINTHER discloses, Applicant submits that WINTHER fails to disclose, or even suggest: inter alia, an electric motor system, comprising at least a first electric motor comprising a first rotor and a first stator, the first rotor being mechanically coupled to an engine, *the first motor being connected to a first*

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*control or power component*, at least a second electric motor comprising a second rotor and a second stator, the second rotor being mechanically coupled to a mechanical aggregate, *the second motor being connected to a second control or power component*, the first and second stators being non-movably coupled to a casing, *each of the first and second control or power components being connected to each other and performing electronic power conversion*, wherein the first electric motor and the second electric motor are electrically coupled to one another and exchange electric power at a freely selectable voltage level, as recited in amended independent claim 29; inter alia, an electric motor system, comprising at least a first electric motor comprising a first rotor and a first stator, the first rotor being mechanically coupled to an engine, at least a second electric motor comprising a second rotor and a second stator, the second rotor being mechanically coupled to a mechanical aggregate, the first stator being coupled to the second stator, the first and second stators being non-movably mounted to a casing, and an electronic power system, *wherein the electronic power system comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module*, and wherein the first electric motor and the second electric motor are electrically coupled to one another via the electronic power system in order to exchange electric power at a freely selectable voltage level, as recited in amended independent claim 81; and inter alia, an electric motor system, comprising a casing, at least

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a first electric motor comprising a first rotor and a first stator system, the first rotor being mechanically coupled to an engine, *an electronic power circuit connected to each of the first motor and an electrical main*, at least a second electric motor comprising a second rotor and a second stator system, the second rotor being mechanically coupled to a mechanical aggregate, *a generator inverter and compressor motor inverter connecting the first and second motors to each other*, and each of the first stator system and the second stator system being coupled to the casing, wherein the first and second stator systems are prevented from rotating relative to the casing, wherein the first rotor and the second rotor rotate about a common axis, and wherein the first electric motor and the second electric motor are electrically coupled to one another and exchange electric power at a freely selectable voltage level, as recited in amended independent claim 82.

As was agreed by the Examiner in the Interview, WINTHER merely discloses using a reversing switch CS to connect windings A and B to, e.g., deliver polyphase current from windings A to windings B (see col. 3, lines 91-98). WINTHER does not, however, disclose or suggest, the features shown in Fig. 2, i.e., the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or the features shown in Fig. 6, i.e., an electronic power system that comprises a first electronic power control circuit

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connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or the features shown in Fig. 7, i.e., an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Thus, Applicant submits that the above-noted claims are not disclosed, or even suggested, by any proper reading of WINTHER.

Applicant notes that, for an anticipation rejection under 35 U.S.C. § 102(b) to be proper, each element of the claim in question must be disclosed in a single document, and if the document relied upon does not do so, then the rejection must be withdrawn.

Because WINTHER fails to disclose at least the above mentioned features as recited in at least amended independent claims 29, 81 and 82, Applicant submits that WINTHER does not disclose all the claimed features recited in at least independent claims 29, 81 and 82.

Furthermore, Applicant submits that dependent claims 31, 34, 40, 42-51, 55-58, 63, 64, 72-77, 79, 80, 83-85, 87-89, 91 and 93-95 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper reading of WINTHER discloses or suggests, in combination: that the first rotor is



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mechanically coupled to the engine via at least one rotating shaft as recited in claim 31; that the second rotor is mechanically coupled to the aggregate via a rotating part as recited in claim 34; that the first electric motor is connected to at least one of at least one external electric circuit, and a machine's mains as recited in claim 40; that at least one of the first and second electric motors is one of an asynchronous type motor, a synchronous type motor, and a reluctance type motor as recited in claim 42; that an axis of the first rotor is aligned with an axis of the second rotor, such that the first and second rotors of the first and second electric motors share a common axis of rotation as recited in claim 43; that the first rotor comprises one of an inner rotor and an outer rotor as recited in claim 44; that the second rotor comprises one of an inner rotor and an outer rotor as recited in claim 45; that the first rotor comprises an inner rotor and the second rotor comprises an outer rotor, each rotating about a common axis as recited in claim 46; that the first rotor comprises an inner rotor and the second rotor comprises an outer rotor as recited in claim 47; that the electrical motor system further comprises a mutual stator plate system as recited in claim 48; that the first and second stators are coupled to the mutual stator plate system the first stator forming part of the first motor and the second stator forming part of the second motor as recited in claim 49; that each of the first and second rotors are rotatable with respect to the mutual stator plate system as recited in claim 50; that the electronic power system comprises at least one of a component and an external electric circuit, which is mounted in the casing as recited in claim 51; that the

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electric motor system further comprises a third control or power component which supplies to an electrical main at least one of a direct current, an alternating current, and a three-phase current as recited in claim 55; that wherein the first stator includes at least two winding systems as recited in claim 56; that wherein the two winding systems are galvanically separated from one another as recited in claim 57; that the at least two winding systems are coupled magnetically with a main flux of at least one of the first and second motors as recited in claim 58; that at least one of the first and second motors functions as a generator and as a motor as recited in claim 63; that the generator is configured to charge an electrical main as recited in claim 64; that each of the at least two winding systems is galvanically independent of the other winding system and is connected with electromechanical function groups on generally different voltage levels as recited in claim 72; that the at least two winding systems are closely magnetically coupled such that an electromagnetic power exchange occurs between the at least two winding systems independent of rotor rotation according to a transformer principle as recited in claim 73; that the at least two winding systems are weakly magnetically coupled such that a slight electromagnetic influence results on the at least two winding systems as recited in claim 74; that a freely selectable electromagnetic power exchange can occur between the at least two winding systems and a rotor shaft connected to one of the first and second rotors as recited in claim 75; that the freely selectable electromagnetic power exchange is adapted to occur by controlling

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electromagnetic parameters as recited in claim 76; that the electromagnetic parameters comprise at least one of currents and flux linking of at least one of the at least two winding systems as recited in claim 77; that each of the first and second electric motors comprise one of an asynchronous motor, a synchronous motor and a reluctance motor as recited in claim 79; that each of the first and second rotors rotate with respect to a common axis as recited in claim 80; that the first and second stators comprise first and second windings, wherein at least one of the first and second windings comprises a groove or air-gap winding as recited in claim 83; that the first stator at least partially surrounds the first rotor and wherein the second rotor at least partially surrounds the second stator as recited in claim 84; that the electric motor system further comprises at least one stator holding member, wherein the first and second stators are coupled to the at least one stator holding member as recited in claim 85; that the first stator comprises a first stator winding and wherein the second stator comprises a second stator winding as recited in claim 87; that at least one of the first and second stator windings comprises a groove or air-gap winding as recited in claim 88; that the first stator at least partially surrounds the first rotor and wherein the second rotor at least partially surrounds the second stator as recited in claim 89; that the electric motor system further comprises at least one stator holding member, wherein the first and second stators are coupled to the at least one stator holding member and wherein the at least one stator holding member is coupled to the casing as recited in claim 91; that the first and second stators are

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arranged to face in opposite directions relative to at least one circumferentially arranged stator holding member as recited in claim 93; that the first stator includes a winding that at least partially surrounds an outer surface of at least one circumferentially arranged stator holding member and wherein the second stator includes a winding that is at least partially surrounded by an inner surface of the at least one circumferentially arranged stator holding member as recited in claim 94; and that the electric motor system further comprises at least one circumferentially arranged stator holding member, the first stator including a first winding that is disposed adjacent an outer circumferential surface of the at least one stator holding member and the second stator including a second winding that is disposed adjacent an inner circumferential surface of the at least one stator holding member as recited in claim 95.

Applicant requests that the Examiner reconsider and withdraw the rejection of the above-noted claims under 35 U.S.C. § 102(b).

***Traversal of Rejections Under 35 U.S.C. § 103(a)***

Applicant respectfully traverses the rejection of claims 30, 32, 33 and 37 under 35 U.S.C. § 103(a) as unpatentable over WINTHER in view of US patent 5,744,895 to SEGUCHI.

Applicant also respectfully traverses the rejection of claims 35 and 36 under 35 U.S.C.

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§ 103(a) as unpatentable over WINTHER in view of US patent 5,912,516 to ATKINSON et al.

Applicant additionally also respectfully traverses the rejection of claims 38, 39 and 54 under 35 U.S.C. § 103(a) as unpatentable over WINTHER in view of US patent 6,133,659 to RAO.

Applicant further also respectfully traverses the rejection of claim 86 under 35 U.S.C. § 103(a) as unpatentable over WINTHER in view of US patent 5,289,072 to LANGE.

Applicant also respectfully traverses the rejection of claims 98-98 under 35 U.S.C. § 103(a) as unpatentable over WINTHER in view of US patent 5,814,913 to OJIMA et al.

The Examiner asserted that WINTHER fairly discloses all of the claimed features recited in these claims except for the following: a three-phase motor; an aggregate in the form of a turbocharger and turbo-engine; a first electric motor integrated with an engine or flywheel; a mutual stator plate system having first and second stators; and first and second motors having spaced apart axes. However, the Examiner asserted that SEGUCHI teaches a three-phase motor, that ATKINSON teaches an aggregate in the form of a turbocharger and turbo-engine, that RAO teaches a first electric motor integrated with an engine or flywheel, that LANGE teaches the recited first and second circumferentially arranged stator members, and that OJIMA teaches first and second motors having spaced apart axes. Applicant respectfully traverses each of these rejections.

Again, as a preliminary matter, the Examiner essentially agreed to reconsider and withdraw this rejection based upon arguments made during the interview and upon the filing of an Amendment to claims 29, 81 and 82, i.e., that none of the applied documents, and especially WINTHER, disclose or suggest the features shown in Fig. 2, i.e., the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or the features shown in Fig. 6, i.e., an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or the features shown in Fig. 7, i.e., an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other. Accordingly, Applicant submits that as the above noted claims have been amended to recite features indicated in the Interview of December 9, 2003 to define over the applied documents, these claims are allowable at least for this reason.

Furthermore, Applicant submits that no proper combination of WINTHER and SEGUCHI, WINTHER and ATKINSON, WINTHER and RAO, WINTHER and LANGE and WINTHER and OJIMA, discloses or suggests the invention as defined by at least

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independent claims 29, 81 and 82 as amended. Notwithstanding the Office Action assertions as to what these documents disclose, Applicant submits that no proper combination of these documents discloses or suggests, inter alia, an electric motor system, comprising at least a first electric motor comprising a first rotor and a first stator, the first rotor being mechanically coupled to an engine, *the first motor being connected to a first control or power component*, at least a second electric motor comprising a second rotor and a second stator, the second rotor being mechanically coupled to a mechanical aggregate, *the second motor being connected to a second control or power component*, the first and second stators being non-movably coupled to a casing, *each of the first and second control or power components being connected to each other and performing electronic power conversion*, wherein the first electric motor and the second electric motor are electrically coupled to one another and exchange electric power at a freely selectable voltage level, as recited in amended independent claim 29; inter alia, an electric motor system, comprising at least a first electric motor comprising a first rotor and a first stator, the first rotor being mechanically coupled to an engine, at least a second electric motor comprising a second rotor and a second stator, the second rotor being mechanically coupled to a mechanical aggregate, the first stator being coupled to the second stator, the first and second stators being non-movably mounted to a casing, and an electronic power system, *wherein the electronic power system comprises a first electronic power control circuit connected to each of an electrical main and the first*

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*stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and wherein the first electric motor and the second electric motor are electrically coupled to one another via the electronic power system in order to exchange electric power at a freely selectable voltage level, as recited in amended independent claim 81; and inter alia, an electric motor system, comprising a casing, at least a first electric motor comprising a first rotor and a first stator system, the first rotor being mechanically coupled to an engine, an electronic power circuit connected to each of the first motor and an electrical main, at least a second electric motor comprising a second rotor and a second stator system, the second rotor being mechanically coupled to a mechanical aggregate, a generator inverter and compressor motor inverter connecting the first and second motors to each other, and each of the first stator system and the second stator system being coupled to the casing, wherein the first and second stator systems are prevented from rotating relative to the casing, wherein the first rotor and the second rotor rotate about a common axis, and wherein the first electric motor and the second electric motor are electrically coupled to one another and exchange electric power at a freely selectable voltage level, as recited in amended independent claim 82.*

As explained above, the Examiner agreed in the Interview that WINTHER merely discloses using a reversing switch CS to connect windings A and B to, e.g., deliver polyphase current from windings A to windings B (see col. 3, lines 91-98) and that WINTHER does not



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disclose or suggest, the features shown in Fig. 2, i.e., the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or the features shown in Fig. 6, i.e., an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or the features shown in Fig. 7, i.e., an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Moreover, SEGUCHI lacks two stators which are non-movably connected or mounted to the casing, i.e., are either prevented from rotating relative to the casing or fixed to the casing. Indeed, it is clear from Fig. 1 of SEGUCHI, that while stator winding 1411 is apparently fixed to the casing 1710, the same cannot be said for winding 1211. To the contrary, it is clear from Fig. 1 that winding 1211 rotates with shaft 1213. Moreover, the Examiner has acknowledged in the Interview of June 6, 2003, that SEGUCHI lacks any disclosure to two stators which non-movably mounted relative to a casing.

Additionally, Applicant notes that the Examiner has essentially acknowledged in the Interview of December 9, 2003, that SEGUCHI also lacks any apparent disclosure or

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suggestion with regard to the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or with regard to an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or with regard to an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Next, ATKINSON relates to an alternator/motor that is coupled to a turbine. On the other hand, it is clear that this document lacks first and second motors, much less, two stators which are non-movably connected or mounted to the casing, i.e., are either prevented from rotating relative to the casing or fixed to the casing. Indeed, it is clear from Figs. 1-4 that only a single motor and a stator is utilized. It is also clear, and the Examiner has essentially acknowledged in the Interview of December 9, 2003, that ATKINSON lacks any apparent disclosure or suggestion with regard to the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or with regard to an electronic

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power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or with regard to an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Similarly, RAO relates to an in-line generator that is coupled to a flywheel 26. On the other hand, it is clear that this document lacks first and second motors, much less, two stators which are non-movably connected or mounted to the casing, i.e., are either prevented from rotating relative to the casing or fixed to the casing. Indeed, it is clear from Fig. 2 that only a single motor and a stator is utilized. Moreover, the Examiner has essentially acknowledged in the Interview of December 9, 2003, that RAO also lacks any apparent disclosure or suggestion with regard to the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or with regard to an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or with regard to an electronic

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power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

With regard to LANGE, Applicant acknowledges that this document apparently discloses circumferentially arranged stator halves. However, Applicant notes that there is no apparent disclosure with regard to two stators of two motors wherein the stators are non-movably connected or mounted to the casing. To the contrary, it is clear from a proper reading of LANGE that while there is disclosure regarding a stator being formed of stator halves (which are separated by members 12), there is no disclosure indicating that these components are separate or distinct stators. As the Examiner will note from col. 1, lines 56-61, this document emphasizes that only a single stator is needed. Thus, Applicant submits that contrary to the Examiner's assertions, LANGE does not disclose two stators of two motors, much less, two stators of two motors coupled or non-movably mounted or connected to the casing.

Applicant further notes that the Examiner has essentially acknowledged in the Interview of December 9, 2003, that LANGE also lacks any apparent disclosure or suggestion with regard to the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or with regard to an electronic power system

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that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or with regard to an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Finally, Applicant acknowledges that Fig. 1 of OJIMA apparently shows two rotors with spaced apart axes. However, Applicant submits that there is no apparent disclosure with regard to the first motor being connected to a first control or power component, the second motor being connected to a second control or power component and each of the first and second control or power components being connected to each other and performing electronic power conversion, and/or with regard to an electronic power system that comprises a first electronic power control circuit connected to each of an electrical main and the first stator, a second electronic power control circuit connected to each of the main and the second stator, and an electronic power module, and/or with regard to an electronic power circuit connected to each of the first motor and an electrical main and a generator inverter and compressor motor inverter connecting the first and second motors to each other.

Thus, Applicant submits that the above-noted documents fails to disclose or suggest the features recited in at least independent claims 29, 81 and 82. Because no proper modification or combination of WINTHER, SEGUCHI, ATKINSON, RAO, LANGE and

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OJIMA discloses or suggests at least the above-noted features of the instant invention, Applicant submits that these documents fails to render unpatentable the combination of features recited in at least independent claims 29, 81 and 82.

Furthermore, Applicant submits that there is no motivation or rationale disclosed or suggested in the art to modify WINTHER in the manner asserted by the Examiner. Nor does the Examiner's opinion provide a proper basis for these features or for the motivation to modify this document, in the manner suggested by the Examiner, in view of SEGUCHI, ATKINSON, RAO, LANGE or OJIMA. Therefore, Applicant submits that the invention as recited in at least independent claims 29, 81 and 82 is not rendered obvious by any reasonable inspection of these disclosures.

Applicant directs the Examiner's attention to the guidelines identified in M.P.E.P section 2141 which state that "[i]n determining the propriety of the Patent Office case for obviousness in the first instance, it is necessary to ascertain whether or not the reference teachings would appear to be sufficient for one of ordinary skill in the relevant art having the reference before him to make the proposed substitution, combination, or other modification." *In re Linter*, 458 F.2d 1013, 1016, 173 USPQ 560, 562 (CCPA 1972).

As this section clearly indicates, "[o]bviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention where there is some teaching, suggestion, or motivation to do so found either in the references themselves

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or in the knowledge generally available to one of ordinary skill in the art. *In re Fine*, 837 F.2d 1071, 5 USPQ2d 1596 (Fed. Cir. 1988); *In re Jones*, 958 F.2d 347, 21 USPQ2d 1941 (Fed. Cir. 1992).”

Moreover, it has been legally established that “[t]he mere fact that references can be combined or modified does not render the resultant combination obvious unless the prior art also suggests the desirability of the combination. *In re Mills*, 916 F.2d 680, 16 USPQ2d 1430 (Fed. Cir. 1990) .... Although a prior art device "may be capable of being modified to run the way the apparatus is claimed, there must be a suggestion or motivation in the reference to do so." 916 F.2d at 682, 16 USPQ2d at 1432.). See also *In re Fritch*, 972 F.2d 1260, 23 USPQ2d 1780 (Fed. Cir. 1992) (flexible landscape edging device which is conformable to a ground surface of varying slope not suggested by combination of prior art references).

Additionally, it has been held that “[a] statement that modifications of the prior art to meet the claimed invention would have been " well within the ordinary skill of the art at the time the claimed invention was made" because the references relied upon teach that all aspects of the claimed invention were individually known in the art is not sufficient to establish a prima facie case of obviousness without some objective reason to combine the teachings of the references. *Ex parte Levengood*, 28 USPQ2d 1300 (Bd. Pat. App. & Inter. 1993).”

Furthermore, Applicant submits that dependent claims 30, 32, 33, 35-39, 54, 86 and

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96-98 are allowable at least for the reason that these claims depend from allowable base claims and because these claims recite additional features that further define the present invention. In particular, Applicant submits that no proper combination of WINTHER, SEGUCHI, ATKINSON, RAO, LANGE and OJIMA discloses or suggests, in combination: that at least one of the first and second motors is of a three-phase type as recited in claim 30; that the engine comprises an internal combustion engine as recited in claim 32; that the first rotor is mechanically coupled to the internal combustion engine via at least one rotating shaft as recited in claim 33; that the aggregate comprises at least one of a turbo-engine and a turbocharger as recited in claim 35; that the aggregate comprises at least one of a turbo-engine and a turbocharger as recited in claim 36; that the electric motor system further comprises a gearbox, wherein the first electric motor is mechanically connected to the engine via the gearbox as recited in claim 37; that the first electric motor is at least one of integrated with the engine and integrated with a flywheel of the engine as recited in claim 38; that the engine comprises a flywheel and wherein the first electric motor is structurally integrated with the flywheel as recited in claim 39; that wherein the casing houses at least one of the first and second motors, wherein the casing includes one of a cooling system and a liquid cooling system as recited in claim 54; that the electric motor system further comprises first and second circumferentially arranged stator holding members, the first stator being mounted on an outer circumferential surface of the first stator holding member and the second stator



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being mounted on an inner circumferential surface of the second stator holding member as recited in claim 86; that the first rotor comprises a first axis and wherein the second rotor comprises a second axis, and wherein the first and second axes are spaced apart from one another as recited in claim 96; that the first rotor comprises a first axis and wherein the second rotor comprises a second axis, and wherein the first and second axes are spaced apart from one another as recited in claim 97; and that the first rotor comprises a first axis and wherein the second rotor comprises a second axis, and wherein the first and second axes are spaced apart from one another as recited in claim 98.

Accordingly, Applicant requests that the Examiner reconsider and withdraw the above-noted rejection under 35 U.S.C. § 103(a) and indicate that these claims are allowable over the applied art of record.

### **CONCLUSION**

Applicant respectfully submits that each and every pending claim of the present invention meets the requirements for patentability under 35 U.S.C. §§ 112, 102 and 103 and respectfully requests the Examiner to indicate allowance of each and every pending claim of the present invention.

In view of the foregoing, it is submitted that none of the references of record, either taken alone or in any proper combination thereof, anticipate or render obvious the

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Applicant's invention, as recited in each of the pending claims. The applied references of record have been discussed and distinguished, while significant claimed features of the present invention have been pointed out.

Further, any amendments to the claims which have been made in this response and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

The Commissioner is hereby authorized to charge any fees necessary for consideration of this amendment to deposit account No. 19-0089.

Should the Examiner have any further comments or questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,  
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